

UNITED STATES DISTRICT COURT OF THE DISTRICT OF OREGON
PORTLAND, DIVISION

SANDRA PETERSEN and KINGWOOD
TRUST.,

Plaintiffs,

vs.

CITY OF MANZANITA, OREGON.

Defendants.

Case No.: 3:18-cv-01143

MOTION FOR PRELIMINARY
INJUNCTION

Plaintiffs request the imposition of a preliminary injunction against Defendant, City of Manzanita to:

1. Delay the trial on citation numbers 17-V-000524 A/B, 17-V-000525 A/B, 17-V-000526 A/B, 17-V-000580, 17-V-000581, 17-V-000582 A/B, and the Order to Show Cause currently scheduled for August 10, 2018, in the Municipal Court for the City of Manzanita.

2. To keep that injunction in place until a determination is made by the Court with respect to the claims asserted by Plaintiff in the Complaint filed herewith. (Exhibit 1)

Page 1 – MOTION FOR PRELIMINARY INJUNCTION

1 Plaintiffs rely upon the claims asserted in the Complaint and the Affidavit of Sandra
2 Petersen in support of this motion, as well as the declaration of attorney, Christian Zupancic filed in
3 support of the motion and the declaration of attorney, Kevin O'Connell referencing public records.
4
5
6

7 Dated this 27 day of June, 2018.
8

9 Submitted by:



10 Kevin O'Connell, OSB No. 66092
11 Hagen O'Connell & Hval LLP
12 8555 SW Apple Way, Suite 300
13 Portland, Oregon 97225
14 Telephone: (503) 227-2900
15 Facsimile: (503) 227-3870
16 koconnell@hagenoconnell.com
17
18
19
20
21
22
23
24
25
26